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March 21, 2024

BY ECF:

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

RE: United States v. Bruce Melvin
Case No.: 23-CR-00204-002
Southern District of New York
Letter Motion Seeking Extension of Time to File Motions

MEMO ENDORSED

*Defendant Melvin's time to file
pretrial motions is extended to April 5,
2024. No further extension will be
granted.*

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.
Dated: March 21, 2024

Dear Judge Gardephe:

Please be advised that I represent **Bruce Melvin** in the above captioned action.

Pursuant to the Court's Order (ECF No.: 98), Pre-Trial Motions are due today (March 21, 2024). I previously filed a letter motion seeking extension of time to file motions (ECF No.: 97) and it was granted. However, along with the issues we have had accessing Mr. Melvin at MDC Brooklyn, I am requesting additional time to confer with Mr. Melvin about a potential plea agreement before my office can file these motions. Furthermore, I am requesting additional time due to the Government's recently filed Motion for Discovery Sanctions (ECF No.: 86) and Letter Reply to Mr. Melvin's Opposition to this motion (ECF No.: 103). We seek an extension from the court for this deadline to be moved to April 21, 2024.

I have spoken with AUSA Jacob R. Fiddelman regarding this extension and his office takes no position on the request.

Thank you for your time and consideration in this matter.

Sincerely,
Spodek Law Group P.C.
/s/ Todd A. Spodek



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cc: All Counsel of Record (By ECF).